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Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC COMPANY,

Debtors.

- Affects PG&E Corporation
 - Affects Pacific Gas and Electric Company
 - Affects both Debtors

** All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

| Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**DECLARATION OF ROBB MCWILLIAMS IN
SUPPORT OF REORGANIZED DEBTORS'
THIRTY-SEVENTH SECURITIES CLAIMS
OMNIBUS OBJECTION
(INSUFFICIENT SUBSTANTIVE
ALLEGATIONS CLAIMS)**

Date: March 12, 2024

Time: 10:00 a.m. (Pacific Time)

Place: (Tele/Videoconference Appearances Only)

United States Bankruptcy Court

Courtroom 17, 16th Floor
San Francisco, CA 94102

San Francisco, CA 94102

1 I, Robb McWilliams, pursuant to section 1746 of title 28 of the United States Code, hereby
2 declare under penalty of perjury that the following is true and correct to the best of my knowledge,
3 information and belief:

4 1. I am a Partner and Managing Director at the firm of AlixPartners, LLP
5 (“AlixPartners”), which is an affiliate of both AlixPartners, LLC and AP Services, LLC, (“APS”).
6 APS was previously retained to provide interim management services to PG&E Corporation and
7 Pacific Gas and Electric Company, as debtors and reorganized debtors (collectively, “PG&E,” the
8 “Debtors,” and as reorganized pursuant to the Plan, the “Reorganized Debtors”) in the above-
9 captioned chapter 11 cases (the “Chapter 11 Cases”). I submit this Declaration in support of the
10 *Reorganized Debtors’ Thirty-Seventh Securities Claims Omnibus Objection (Insufficient*
11 *Substantive Allegations Claims*) (the “Omnibus Objection”), filed contemporaneously herewith.¹

12 2. In my current position, I am responsible for overseeing the bankruptcy case
13 management component of AlixPartners’ assignment to assist the Reorganized Debtors with
14 various matters related to these Chapter 11 Cases. My areas of responsibility include (a) the effort
15 by AlixPartners, in coordination with the Reorganized Debtors, to review and assess the validity
16 of all claims asserted against the Debtors, other than Fire Claims and Subrogation Wildfire Claims,
17 and (b) providing support with respect to Securities Claims. I am generally familiar with the
18 Reorganized Debtors’ day-to-day operations, financing arrangements, business affairs, and books
19 and records. Except as otherwise indicated herein, all facts set forth in this Declaration are based
20 upon my personal knowledge, the knowledge of other AlixPartners professionals working under
21 and alongside me on this matter, my discussions with the Reorganized Debtors’ personnel and the
22 Reorganized Debtors’ various advisors and counsel, and my review of relevant documents and
23 information. If called upon to testify, I would testify competently to the facts set forth in this
24 Declaration. I am authorized to submit this Declaration on behalf of the Reorganized Debtors.

25 3. The AlixPartners team under my supervision has been actively and intimately

26 ¹ Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms
27 in the Omnibus Objection.

1 involved in the claims review and reconciliation process. AlixPartners initially assisted the Debtors
2 in the preparation of their bankruptcy schedules based on the Debtors' books and records.
3 AlixPartners is now supporting, and will continue to support, the efforts of the Reorganized
4 Debtors and their counsel to resolve disputed claims, including by formal objections as necessary.

5 4. As part of the claims review and reconciliation process, the AlixPartners team,
6 working with the Reorganized Debtors' personnel and other professionals, identified a number of
7 filed proofs of claim for which Claimants fail to allege a cause of action against PG&E or allege
8 or adopt facts supporting securities claims against PG&E – even after receiving notice of the claims
9 amendment deadline set forth in the Amendment and Objection Procedures Order.

10 5. The Omnibus Objection is directed to the Claims identified in **Exhibit 1** attached
11 thereto, in the column headed “Claims to Be Disallowed and Expunged.” **Exhibit 1** to the Omnibus
12 Objection was prepared by the AlixPartners team under my overall supervision, and I am familiar
13 with the document, its contents, and the process under which it was prepared.

14 6. On July 28, 2023, the Reorganized Debtors served notice of the Amendment and
15 Objection Procedures Order on all Securities Claimants, as described in the August 17, 2023
16 *Certificate of Service of Victor Wong Regarding Order Authorizing Amendment And Objection*
17 *Procedures For Securities Claims* [Dkt. No. 13960] and the October 9, 2023 *Certificate of Service*
18 *of Alain B. Francoeur Regarding Order Authorizing Amendment And Objection Procedures For*
19 *Securities Claims* [Dkt. No. 13973].

20 7. In accordance with the Amendment and Objection Procedures Order, Claimants
21 had until October 6, 2023 to amend their proofs of claim to allege facts supporting their purported
22 securities claims against PG&E, and until October 13, 2023 to adopt allegations from a complaint
23 already filed with another claimant's proof of claim. In the event that a claimant failed to amend
24 their proof of claim or adopt the allegations of a complaint, their claims would be subject to a
25 sufficiency objection under a standard akin to Federal Rule of Civil Procedure 12(b)(6). None of
26 the Claims identified on **Exhibit 1** contain allegations or facts to support purported securities
27 claims against PG&E.

1 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true
2 and correct to the best of my knowledge, information, and belief.
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4 Executed December 13, 2023 in Dallas, Texas.
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6 */s/ Robb McWilliams*
7 Robb McWilliams
8 Partner and Managing Director
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